

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: § **CASE NO. 23-30835**
PHASE ONE SERVICES LLC §
§
§
Debtor § **CHAPTER 11**

DECLARATION OF ASHLEY WILLIAMS IN SUPPORT OF
DEBTOR'S MOTION FOR AUTHORITY TO USE CASH COLLATERAL

I, Ashley Williams, state as follows:

I. INTRODUCTION

1. I am the Owner of Phase One Services LLC, the Debtor and Debtor-in-Possession (“Debtor”). I am familiar with the Debtor’s day-to-day operations, business affairs, books and records.
 2. I submit this declaration (“Declaration”) to assist the Court and other parties-in-interest in understanding the need for emergency consideration of the Debtor’s Motion for Authority to Use Cash Collateral.
 3. Except as otherwise indicated, all facts set forth in this Declaration are based upon my personal knowledge, my review of relevant documents, or my opinion based on my experience and knowledge of the Debtor’s operations. If I were called to testify, I would testify competently to the facts set forth in this Declaration.

II. EXPEDITED MOTION FOR AUTHORITY TO USE CASH COLLATERAL

4. On March 8, 2023, the Debtor filed a Motion for Authority to Use Cash Collateral. The basis of this Motion is the allow the Debtor to continue operating its trucking transportation business.

5. Expedited consideration is requested because immediate use of cash collateral is necessary.
6. The Debtor coordinates shipping and transportation of goods across the country. The continued operation of Phase One Services LLC depends on the ability to pay subcontractors and service its customers.

III. CONCLUSION

7. Approval of the Motion is in the best interest of the Debtor, its estate, and its creditors.
8. I have reviewed this Declaration and hereby declare under penalty of perjury that the foregoing is true and correct and within my own personal knowledge.

Executed this 8th day of March 2023.

/s/ Ashley Williams
Ashley Williams
Owner/President